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4 Attorneys for Defendant, MARIO RENDA

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8 UNITED STATES DISTRICT COURT  
9 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

10 AIRLINES REPORTING CORPORATION,

11 Plaintiff/Judgment Creditor,

12 v.

13 COMMERCIAL TRAVEL  
CORPORATION d/b/a MATLOCK  
14 TRAVEL, *et al.*,

15 Defendants/Judgment Debtors.

CASE NO. 08-MC-00088

DECLARATION OF MARIO RENDA IN  
SUPPORT OF MOTION TO VACATE  
JUDGMENT PURSUANT TO FEDERAL  
RULES OF CIVIL PROCEDURE, RULE 60  
(b)(4)

Date: July 25, 2008  
Time: 10:00 a.m.  
Ctrm.: 1, 4<sup>th</sup> Floor  
Judge: Hon. Irma E. Gonzalez

Judgment: September 4, 2007

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19 I, Mario Renda, declare:

20 1. I am a defendant in this matter. I am submitting this declaration in support of  
21 my motion to vacate plaintiff AIRLINES REPORTING CORPORATION's default judgment  
22 on the grounds that the default judgment is void because the United States District Court for  
23 the Eastern District of Virginia did not have personal jurisdiction over me. I have personal  
24 knowledge of the information in this Declaration, except to as to matters that I have declared  
25 on information and belief, and as to those matters, I believe them to be true.

26 2. At all times relevant to this matter, I have been a resident of San Diego County,  
27 California. I have never lived in Virginia, nor have I ever owned or rented property in

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1 Virginia, either personally, or through any legal entity. I have never owned any assets in  
2 Virginia of any kind.

3 3. I have no contacts with the State of Virginia. I do not, nor have I ever, done  
4 business in the State of Virginia, either personally or through any legal entity. I have never  
5 worked in Virginia, held any type of license in Virginia, or paid taxes in Virginia.

6 4. In this action, and in two other actions ARC brought against me, ARC and its  
7 counsel, Suzanne Lewis, has alleged that I was an officer, director and/or shareholder of  
8 various travel agencies, and accused me of wrong-doing in business relationships those  
9 agencies had with ARC. I have never met Ms. Lewis, or any other counsel for ARC. For that  
10 matter, I have never met any employee or representative of ARC to my knowledge. ARC's  
11 allegations and accusations against me in this case, in the case it filed against me at the same  
12 time in the United States District Court for the Eastern District of Virginia, *Airlines Reporting*  
13 *Corp. v. Uniglobe Fairway Travel, Inc., et al.*, United States District Court for the Eastern  
14 District of Virginia, Alexandria Division, Civil Action No: 1:04cv622, and in the case it filed  
15 against me in Virginia state court, *Airlines Reporting Corp. v. McCord Consumer Direct, Inc.*,  
16 *d/b/a A Better Airfare, et al.*, Circuit Court for Arlington County, Virginia, At Law No.: 05-  
17 367, are false.

18 5. I am not, nor have I ever been, an employee, agent, officer, director, chairman,  
19 principal, financier, or shareholder of COMMERCIAL TRAVEL CORPORATION d/b/a  
20 MATLOCK TRAVEL. I was never involved in any way in business dealings between  
21 MATLOCK TRAVEL and ARC.

22 6. I am not, nor have I ever been, an employee, agent, officer, director, chairman,  
23 principal, financier, or shareholder of COMMERCIAL TRAVEL CORPORATION d/b/a  
24 COSTA TRAVEL. I was never involved in any way in business dealings between COSTA  
25 TRAVEL and ARC.

26 7. I am not, nor have I ever been, an employee, agent, officer, director, chairman,  
27 principal, financier, or shareholder of Uniglobe Fairway Travel, Inc.. I was never involved  
28 in any way in business dealings between Uniglobe and ARC.

1 8. I am not, nor have I ever been, an employee, agent, officer, director, chairman,  
2 principal, or shareholder of Aloha Continental Tours & Travel. I was never involved in any  
3 way in business dealings between Aloha and ARC.

4 9. I am not, nor have I ever been, an employee, agent, officer, director, chairman,  
5 principal, or shareholder of McCord Consumer Direct, Inc., dba A Better Airfare. I was  
6 never involved in any way in business dealings between McCord and ARC.

7 10. Contrary to ARC and Ms. Lewis' allegations, I did not participate in any  
8 manner in the preparation of any type of report, traffic document, or other documents  
9 submitted to ARC by any person or entity. I also did not participate in any manner in the use  
10 of credit cards in any business dealings between any person or entity and ARC.

11 11. I have never done business with ARC, either personally or through any entity. I  
12 have never signed, been a party to, or agreed to be bound by any type of contract with ARC,  
13 nor have I been involved in any way in the negotiation of any type of contract with ARC.

14 12. I did not appear in the various cases ARC filed against me and others in the  
15 State of Virginia because it would have been an enormous burden to me to defend these actions  
16 on the East Coast. I had no contact with Virginia and I considered the cases to be frivolous  
17 because ARC's allegations against me are false.

18 I declare under penalty of perjury under the laws of the State of California that the  
19 forgoing is true and correct, and that this declaration was executed on June 30, 2008, in  
20 San Diego, California.

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22 MARIO RENDA  
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